1890-017 Chancery Causes: Nancy Freeman vs. William Freeman
Lee Co.

Gibson, Pridemore

CA-Divorce
T-Vices

To the Hon. H. S. K. Morison
Judge of the Circuit Court
of Lee County Va.

Your oratrix Nancy Freeman who humbly complaining would respectfully represent that, that several years ago she intermarried with one Wm. Freeman, with whom she lived as his wife for several years. About five years ago her said husband abandoned her, and has ever since lived apart from her. He eloped with an other woman, and has ever since lived with her, and passes her for his wife, as your complainant has been informed and charges. This respondent and her said husband were married in the State of Tenn where they for awhile resided, when they removed to this County, and were here residing when, her said husband abandoned her, and where she has continued to reside and is at present and ever since been a citizen

Your oratrix has never in any way condoned said offence, or lived or co-habited with her said husband since his said abandonment. She therefore charges that her said husband has been and is continually guilty of gross and almost public acts of adultery, continually violating his marriage vows. That he has so continually abandoned her and lived seperate and apart from her for more than five years. That he is a non-resident of this State where he was formerly a citizen and where your oratrix has her domicil and expects to continue to reside - and where she has so resided for five years or more.

The object of this bill is to have said contract of marriage, annulled set-aside vacated and counted for naught - and that your complainant be decreed an absolute divorce from said bonds of matrimony now existing between her & her said husband.

The prayer of your oratrix therefore

is that William Freeman be made a party hereto and answer the same. And on a hearing a divorce absolute be decreed her from said bonds of matrimony, and she be released therefrom. And for all other further and general relief. May supra issue &c.

A L Pridemore

p. q.

C 6.65
N.P. 75
Pr 5.00
Atty 15.00
$27.40

P

Nancy Freeman

v } Bill Chy

William Freeman

1890 2nd Feby Rules Bill filed. Sp'd no executed order Pub. & cont'd,
" 1st March Rules Cont'd
" 2: Mr. Rules Order Pub Complt'd & cause set for hearing by Plff.
" March Term Decree Final

80 to 90

F

Nancy Freeman pltff
against
William Freeman deft

In Chy

This cause came on this day to be heard upon the bill of the pltff and depositions of witnesses and was argued by Counsel. And it appearing that the order of publication has been duly made, and the acts of adultery and abandonment fully proven. On consideration whereof and for reasons appearing to the Court it is adjudged ordered and decreed that the bonds of matrimony heretofore existing ~~between~~ the pltff & defendant, be and the same are hereby annulled set aside and made void as to the pltff, and she has leave to marry again; but the defendant is restrained from again marrying. And no further action being necessary the cause is stricken from the docket.

Nancy Freeman

vs } Decree
Final

Wm Freeman

March 7. 1890.

Entered Chicy
O.B. 249 5 d
April 1st 1890
J. A. L. Hyatt C.

Entered this
Apl. 1890
H.L.K.M.

(1)

The Deposition of Jasper Gibson and others, taken before me, a Notary Public in and for Lee County, State of Virginia, at the Law Office of Genl. A. L. Phidemore, in the town of Jonesville, on the 7th day of March 1890, which he intends to be read as evidence on behalf of Nancy Freeman, in a certain suit in Chancery now pending in the Circuit Court of Lee County aforesaid, wherein said Nancy Freeman is Plaintiff and William Freeman is Defendant.

Jasper Gibson, a witness of lawful age, being first duly sworn, deposes and says: —

Quest 1. Please state whether or not you know Wm Freeman the defendant in this cause if so where does he reside how long has he lived there and tell all you may know about him and his wife Nancy Freeman?

Ans. I know William Freeman and he now resides in the State of Tennessee, in Hancock County, and he and his wife Nancy Freeman have been separated five years, he and his said wife not having lived together during that time; William Freeman, for the last three or four years has lived with another woman, and she has children by him, and he claims to be married

to her, and they lived together as man and wife, Nancy Freeman now resides in the State of Virginia and has so resided for some time past.
And further this deponent saith not. Witness, following signature and seal.

Jasper his X mark Gibson (seal)

Charity A. Freeman, another witness of lawful age, being duly sworn, deposes and says:—

Inst 1? Please state all you may know all about Wm Freeman & his wife Nancy Freeman living together & seperating &c.

Answer. I know that William Freeman and Nancy Freeman were married and lived together as man and wife some six or seven years ago, they then separated and have lived apart about five years.
William Freeman then went off to Tennessee where he now lives with another woman as his wife and calls her, his wife, and she has children by him, Nancy Freeman lives in state of Virginia, and she has not lived with William Freeman since she and said William Freeman separated.
And further this deponent saith not. Witness, the following signature and seal.

Charity her A. X mark Freeman (seal)

Charles Freeman, another witness of lawful age, being first duly sworn, deposes and says:—

Inesks I have heard read over, the depositions of Jasper Gibson and Charity A. Freeman, and I know

the facts stated by them, in regard to William and Nancy Freeman, to be true.
And further this deponent saith not.
Witness, the following signature and seal.

Charles his X mark Freeman (seal)

Virginia, Lee County, to-wit:- I, John B. West, a Notary Public in and for said county and state, do certify, that the foregoing depositions were taken sworn to, and subscribed before me at the time place and for the purpose mentioned in the caption.
Given under my hand this, 7th, day of March 1890.

John B. West, N. P. &c.

N. P. Fee: 75 cts.

Nancy Freeman
vs. } Depositions.
William Freeman

Filed March 7 1890
J. A. G. Hyatt

N. P. fee 75¢

Nancy Freeman Deft
vs } In Chcy.
William Freeman Deft

A. L. Pridemore this day personally appeared before me and made oath in due form that the Defendant William Freeman is a non resident of this State as he is informed and verily believes. Given under my hand this Feby 5th/890.

J. Alex Hyatt C

Nancy Freeman
vs } Affidavit
William Freeman.

Filed Feby 5th 1890.
D. A. S. Hyatt Clk

In the Clerk's Office of the Circuit Court of the County of Lee on the 5th day of Febry, 1890

Nancy Freeman Plaintiff
against
William Freeman Defendant

In Chancery

The object of this suit is to annul, set aside a marriage Contract between the Pltff and Deft.

And an affidavit having been made and filed that the defendant William Freeman is not a resident of the State of Virginia, it is ordered that he do appear here within fifteen after due publication hereof, and do what may be necessary to protect his interest in this suit. And it is further ordered that a copy hereof be published once a week for four week's in some newspaper, and that a copy be forthwith posted at the front door of the court-house of this county.

A copy—Teste:

A. L. Pridemore p. q. J. N. G. Dysart Clerk.

Nancy Freeman

vs } Order Reb

William Freeman

I certify that I delivered to the Lee County Republican office copy of this order for Reb Feby 5th 1840 and posted a like copy thereof on the front door of Lee Court house on the first day of the March County Court 1840.

J. H. Hyatt D.C.

The Commonwealth of Virginia.

To The Sheriff Of Lee County Greeting:

We Command You to Summon William Freeman

Third

To appear at the Clerk's Office of the Circuit Court of Lee County, at the Courthouse on the first Monday in February next, being rule day to answer a bill in Chancery exhibited in our said Court against him by Nancy Freeman

And have then and there this writ. Witness, J. A. G. Hyatt, Clerk of said Court at the Courthouse.
This [illegible] day of February 1890, in the 114 year of the Commonwealth.

J. A. G. Hyatt Clerk.

A Copy Teste

Nancy Freeman

vs } Libel

William Freeman

To 2nd Feby Rules 1890

Not executed the Deft being a non resident

A. B. Murray S.C.

VIRGINIA:—In the Clerk's Office of the Circuit Court of the County of Lee on the 5th day of February 1890.

Nancy Freeman, Plff.
vs. } In Chan'y.
William Freeman, Deft.

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A copy—Teste:

J. A. G. HYATT, Clerk.

A. L. PRIDEMORE, P. Q. 2 27

I, Geo. W. Blankenship, Editor of the LEE COUNTY REPUBLICAN, a weekly newspaper, published in the town of Jonesville, and county of Lee, do certify that the foregoing Order of Publication was duly published in the above named paper for four successive weeks ending February 22, 1890.

Geo. W. Blankenship,

Editor *Lee County Republican.*

Nancy Freeman

vs } Pub. certificate

Wm. Freeman

Filed Feby 24th 1890

J. A. L. Hyatt C

Pro fee $5.00